UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

HIGH MAINTENANCE BITCH, LLC, a Washington limited liability company Plaintiff, vs. UPTOWN DOG CLUB,INC, a Texas Corporation, Defendant	Case No.: **COMPLAINT** **(JURY TRIAL DEMANDED)**

Plaintiff High Maintenance Bitch, LLC ("HMB") complains against defendant Uptown Dog Club, Inc. ("Uptown"), and for causes of action alleges as follows.

THE PARTIES

1. Plaintiff HMB is a Washington State limited liability company, with its principal place of business at 10015 Lake City Way, NE, Box 315, Seattle, Washington, 98125.

2. HMB is the owner of United States Patent No. D475,163 ("HMB Patent 1"), reproduced as Exhibit A hereto.

3. HMB is the owner of United States Patent No. D468,491 ("HMB Patent 2"), reproduced as Exhibit B hereto.

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4. HMB is the owner of United States Patent No. D475,162 ("HMB Patent 3"), reproduced as Exhibit C hereto.

5. Uptown is a corporation organized and existing under the laws of the state of Texas, with its principal place of business at 9188 Chivalry Court, Frisco, Texas, 75034.

Jurisdiction

6. This is a civil action for patent infringement committed by Uptown.

7. This court has original subject matter jurisdiction over HMB's claims for relief, which arise under the laws of the United States and more particularly Title 35 of the United States Code, Pursuant to 28 USC § 1331.

8. This court has original subject matter jurisdiction over HMD's Claims for relief, which arise under act of Congress relating to patents, pursuant to 28 USC § 1338(a).

Factual Background

9. Uptown has made, used, sold, and/or offered for sale products that implement designs that are within the scope of the claims of HMB Patent 1, HMB Patent 2, and HMB Patent 3.

10. HMB has not licensed or assigned any of its patents to Uptown.

Causes of Action

COUNT I
(Direct Infringement of HMB Patent 1)

11. By this reference HMB incorporates and re-alleges, as though fully set forth herein, paragraphs 1 through 10 above.

12. Uptown without authority has made, used, sold, and/or offered for sale goods within the scope of the claims of HMB Patent 1.

13. The conduct of Uptown as set forth above gives rise to a

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cause of action for direct infringement of HMB Patent 1, pursuant to 35 USC §§ 271(a), 281, and 289.

14. HMB alleges that Uptown will continue to infringe HMB Patent 1 unless enjoined by the court.

15. By reason of the foregoing HMB is entitled to injunctive and monetary relief against Uptown, pursuant to 35 USC §§ 283-285, as more fully set forth below.

COUNT II
(Direct Infringement of HMB Patent 2)

16. By this reference HMB incorporates and re-alleges, as though fully set forth herein, paragraphs 1 through 15 above.

17. Uptown, without authority has made, used, sold, and/or offered for sale goods within the scope of the claims of HMB Patent 2.

18. The conduct of Uptown as set forth above gives rise to a cause of action for direct infringement of HMB Patent 2, pursuant to 35 USC §§ 271(a), 281, and 289.

19. HMB alleges that Uptown will continue to infringe HMB Patent 2 unless enjoined by the court.

20. By reason of the foregoing HMB is entitled to injunctive and monetary relief against Uptown, pursuant to 35 USC §§ 283-285, as more fully set forth below.

COUNT III
(Direct Infringement of HMB Patent 3)

21. By this reference HMB incorporates and re-alleges, as though fully set forth herein, paragraphs 1 through 20 above.

22. Uptown, without authority has made, used, sold, and/or offered for sale goods within the scope of the claims of HMB Patent 3.

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23. The conduct of Uptown as set forth above gives rise to a cause of action for direct infringement of HMB Patent 3, pursuant to 35 USC §§ 271(a), 281, and 289.

24. HMB alleges that Uptown will continue to infringe HMB Patent 3 unless enjoined by the court.

25. By reason of the foregoing HMB is entitled to injunctive and monetary relief against Uptown, pursuant to 35 USC §§ 283-285, as more fully set forth below.

PRAYER FOR RELIEF

WHEREFORE, HMB prays for judgment against Uptown as follows:

A. An order of this court temporarily, preliminarily, and permanently enjoining Uptown Dog Club, Inc., its agents and servant, and any and all parties acting in concert with any of them from directly or indirectly infringing in any manner HMB Patent 1, HMB Patent 2, and HMB Patent3, whether by making, using, selling, and/or offering to sell infringing products, pursuant to at least 35 USC § 283;

B. An award of damages to HMB, in an amount to be proven at trial, pursuant to at least 35 USC § 284;

C. Prejudgment interest pursuant to at least 35 USC § 284;

D. An award of HMB's attorney's fees and expenses pursuant to at least 35 USC § 285; and

E. For such other and further relief as the court deems just, proper and equitable.

DEMAND FOR JURY

Plaintiff High Maintenance Bitch, LLC demands TRIAL BY JURY of all causes so triable.

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Dated this June 8, 2007

/Daniel M Bronski/

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Seattle, WA 98104
(206) 219-0515

Daniel M. Bronski

James J. Ruttler, of Counsel (US Patent Reg. No. 56,919)